

UNITED STATES BANKRUPTCY COURT DISTRICT OF DELAWARE		REQUEST FOR PAYMENT OF ADMINISTRATIVE EXPENSE
In re: FTX Trading, LTD., et al.	Chapter 11 Case Number: 22-11068 (JTD)	THIS SPACE IS FOR COURT USE ONLY
NOTE: This form should not be used for an unsecured claim arising prior to the commencement of the case. In such instances, a proof of claim should be filed.		
Name of Creditor: (The person or other entity to whom the debtor owed money or property.) Seth Melamed Name and Addresses Where Notices Should Be Sent: c/o David Adler McCarter & English, LLP 250 W. 55th Street, 13th Floor New York, NY 10019	<input type="checkbox"/> Check box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars. <input type="checkbox"/> Check box if you have never received any notices from the bankruptcy court in this case. <input type="checkbox"/> Check box if the address differs from the address on the envelope sent to you by the court.	
ACCOUNT OR OTHER NUMBER BY WHICH CREDITOR IDENTIFIES DEBTOR:	Check here if this request: <input type="checkbox"/> replaces a previously filed request, dated: _____ <input type="checkbox"/> amends a previously filed request, dated: _____	
1. BASIS FOR CLAIM <input type="checkbox"/> Goods Sold <input checked="" type="checkbox"/> Services performed <input type="checkbox"/> Money loaned <input type="checkbox"/> Personal injury/wrongful death <input type="checkbox"/> Taxes <input type="checkbox"/> Other (Describe briefly) _____	<input type="checkbox"/> Retiree benefits as defined in 11 U.S.C. §1114(a) <input type="checkbox"/> Wages, salaries and compensations (Fill out below) Provide last four digits of your social security number _____	
2. DATE DEBT WAS INCURRED: 2024		
3. TOTAL AMOUNT OF REQUEST AS OF ABOVE DATE: <u>See Addendum</u> <input type="checkbox"/> Check this box if the request includes interest or other charges in addition to the principal amount of the request. Attach itemized statement of all interest or additional charges.		
4. Secured Claim <input type="checkbox"/> Check this box if your claim is secured by collateral (including a right of setoff). Brief Description of Collateral: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other (Describe briefly) _____ Value of Collateral: \$ _____ <input type="checkbox"/> Check this box if there is no collateral or lien securing your claim.		
5. Credits: The amount of all payments have been credited and deducted for the purposes of making this request for payment of administrative expenses. 6. Supporting Documents: Attach copies of supporting documents, such as purchase orders, invoices, itemized statements of running accounts, contracts as well as any evidence of perfection of a lien. DO NOT SEND ORIGINAL DOCUMENTS. If the documents are not available, explain. If the documents are voluminous, attach a summary. 7. Date-Stamped Copy: To receive an acknowledgment of the filing of your request, enclose a self-addressed envelope and copy of this request.		THIS SPACE IS FOR COURT USE ONLY
Date: November 7, 2024	Sign and print below the name and title, if any, of the creditor or other person authorized to file this request (attach copy of power of attorney, if any). <u>/s/ David J. Adler</u>	
<i>Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571.</i>		

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

Chapter 11

FTX TRADING, LTD., *et al.*,¹

Case No. 22-11068 (JTD)
(Jointly Administered)

Debtors.

ADDENDUM TO ADMINISTRATIVE EXPENSE CLAIM

Seth Melamed (“**Melamed**”), by and through the undersigned counsel, hereby files this administrative expense claim pursuant to 11 U.S.C. § 503(b)(1)(A) and states as follows:

1. The Debtor filed for relief under Chapter 11 of the Bankruptcy Code on November 11, 2024 (the “**Petition Date**”).
2. On or about October 8, 2024, the Bankruptcy Court entered the *Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Debtor Affiliates. Memorandum Opinion and Order* (the “**Confirmation Order**”) [D.I. 26404].
3. Prior to and after the Petition Date, Melamed was the Representative Director (RD) and Chief Operating Officer (COO) of FTX Japan K.K.² The terms of the employment are set forth in the Management Agreement dated March 31, 2022, as amended on June 30, 2022, and as further amended and restated by that certain Amended and Restated Management Agreement dated October 19, 2022 (collectively, the “**FTX Japan Management Agreement**”).³
4. On July 16, 2024, the Court entered an *Order (I) Authorizing And Approving Sale Of Debtors’ Interests In FTX Japan K.K. Free And Clear Of All Liens, Claims, Interests And*

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063, respectively. Due to the large number of debtor entities in these chapter 11 cases (collectively, the “**Debtors**”), a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://cases.ra.kroll.com/FTX>

² The facts set forth in the *Corrected Declaration Of Seth Melamed In Support Of Opposition To Debtors’ Objection To Proofs Of Claim* [D.I. 23173] (“**Melamed Declaration**”) are incorporated herein by reference.

³ Copies of these agreements are attached as Exhibits 6-8 to the Melamed Declaration.

*Encumbrances; (Ii) Authorizing And Approving FTX Japan Holding K.K. 'S Entry Into, And Performance Under, The Purchase And Sale Agreement; (Iii) Dismissing The Chapter 11 Case Of Ftx Japan K.K. Effective As Of Closing; And (Iv) Granting Related Relief (the “**Sale Order**”) [D.I. 20467].*

5. Upon the consummation of the sale of FTX Japan K.K. to Bitflyer Holdings, Melamed was terminated without cause by the Debtor as Representative Director of FTX Holdings on July 30, 2024. Under the FTX Japan Management Agreement, Melamed is owed compensation and other amounts. The Debtors have refused to pay the amounts owed under the FTX Japan Management Agreement.

6. In addition, Melamed was a participant in the key employee incentive plan (the “**KEIP**”) that was approved by this Court by Order entered on June 8, 2023 [D.I. 1589]. Pursuant to the terms of the KEIP, Melamed was entitled to a Transaction Award upon the closing of the sale of FTX Japan K.K. to Bitflyer. The Transaction Award was required to be paid within sixty (60) days of the closing of the sale (on or before September 30, 2024). The Transaction Award has not been paid to date.

Reservation of Rights

Melamed reserves all rights to amend and/or supplement this administrative expense claim at any time and to assert further arguments as the evidence may allow.

McCARTER & ENGLISH, LLP

/s/ Shannon D. Humiston

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- and -

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Date: November 7, 2024